

# **EXHIBIT 11**

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LEAH M. MOORE

August 17, 2004

Via First Class Mail

Kathleen J. Hill, Esq.  
Law Office of Kathleen J. Hill  
92 State Street, Suite 700  
Boston, MA 02109

Re: Griffith v. OneBeacon Insurance Company, et. al.  
U.S.D.C. Massachusetts, Docket No. 03-CV-12573-EFH

Dear Attorney Hill:

Thank you for the information regarding William Queenan. Though he had no recollection of the document, Mr. Queenan agrees that it is his signature and will confirm that at his deposition. Accordingly, we are happy to produce him for deposition currently scheduled for 10:00 a.m. on Tuesday, August 30, 2004 at your office.

Though we are willing to produce Mr. Queenan for deposition, Defendants' objection to the subpoena *duces tecum* served upon him remains. As previously stated, the subpoena is both grossly overbroad and wholly inappropriate, and Defendants object to Plaintiff's service of a subpoena *duces tecum* in lieu of a request for production.

Should you have any questions or concerns, please do not hesitate to contact me.

Regards,  
  
Leah M. Moore

cc: Joan K. Geddes, Esq.  
William Queenan  
Keith B. Muntyan, Esq.